Chapter 2
PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

Chapter 2 of the Draft Environmental Impact Statement (DEIS) described the proposed Wild Horse Wind Power Project (WHWPP), and included information regarding the project site and location, facilities, construction activities and costs, operation and maintenance activities, mitigation inherent in project design, and decommissioning. Also described were the no action alternative, alternatives considered but eliminated, off-site alternatives, alternative transmission interconnection, benefits or disadvantages for reserving project approval for a later date, regulations and permits, coordination and consultation with the public and other organizations, and potential future activities.

Revisions to sub-sections within Chapter 2 of the DEIS, presented below, are based on additional and updated information or corrections provided by the Applicant or the Washington Energy Facility Site Evaluation Council (EFSEC) adjudicative hearings, in addition to information provided by the agencies, in the Development Agreement between the Applicant and Kittitas County (Appendix A), and in the Settlement Agreement between the Applicant and the Washington State Department of Fish and Wildlife (WDFW) (Appendix B). Revisions to the off-site alternatives analysis for the Desert Claim Wind Power Project (DCWPP) have been updated, where applicable, with the August 2004 Final Environmental Impact Statement (FEIS) issued for the project. Tables included in this chapter reflect only those items with revisions. Table entries in the DEIS that were not changed are not repeated here.

2.1.1 Applicant

Applicant Wind Power Projects

Kittitas Valley Wind Power Project (181.5 to 246 MW)

Zilkha Renewable Energy is proposing to construct a 181.5 to 246 MW wind project located on open ridgetops between Ellensburg and Cle Elum, about 12 miles northwest of the City of Ellensburg in Kittitas County, Washington. A DEIS was prepared on the project in December 2003. A Draft Supplemental EIS was issued in August 2004. The project could be on line one year following approval by the governor of the state of Washington. Energy would be sold to Puget Sound Energy (PSE), the Bonneville Power Administration (BPA), or another utility. However, the power would be transmitted through either BPA and/or PSE transmission systems.

2.2 Description of Proposed Action

The following description of the proposed action is presented, in large part, from the final "Application for Site Certification, Wild Horse Wind Power Project" prepared and submitted on March 9, 2004 to

EFSEC by Wind Ridge Power Partners, LLC. Information regarding project alternatives was derived from the December 2003 "Kittitas Valley Wind Power Project Draft Environmental Impact Statement" prepared by EFSEC, and December 2003 "Desert Claim Wind Power Project" prepared by Kittitas County. Revisions to the proposed action presented in this Chapter have been provided by the Applicant. Revisions to the alternatives analysis have been updated from information provided in the Final Environmental Impact Statement prepared for the DCWPP (Kittitas County 2004).

2.2.1 Project Overview

Due to Federal Aviation Administration (FAA) restrictions, nine turbine locations (A1, A2, A3, B1, B2, B3, D1, D2, D3 have been removed from the original proposal evaluated in the DEIS. As such, a revised site layout illustrating these key elements is contained in Figure 1-4 of this FEIS. Maps showing the project location are presented in Section 2.2.2, "Project Site and Location" and in Figure 1-1. Although turbine *locations* have been removed, the Applicant would attempt to re-allocate the nine turbines along string corridors identified in the application, and therefore the total number of turbines would not change. Project construction could begin in the summer of 2005 immediately after obtaining approval from the Governor, and it is anticipated that the Project would take about 1 year to construct. The expected service life of the project is 20 years. Refer to Section 2.2.6, "Decommissioning" for details addressing upgrade of equipment with more efficient turbines after the first 20-year period.

Impact Analysis and Design Scenarios

The Applicant has fully analyzed the entire range of potential impacts and described all potential environmental effects from the full range of sizes and types of wind turbines associated with the three scenarios evaluated in this EIS. The impacts of the design scenarios are presented in Chapter 3 of this EIS. The potential impacts to earth, air, water, wildlife, socioeconomics, public health and safety, and other elements of the environment have been examined for the full range of sizes and numbers of wind turbines. In consultation with WDFW and other local agencies, and in response to comments received on the DEIS, additional mitigation measures have been identified and are proposed in the appropriate resource sections of Chapter 3 of this FEIS.

2.2.3 Project Facilities

Interconnection Facilities and Substations

The project substation and transmission facilities would consist of one or two step-up substations (indicated as the BPA and PSE step-up substations on the site layout in Figure 1-2), the PSE substations, and one to two feeder lines running from the step-up substation(s) to the interconnection substation(s). The step-up substations are located on the project site whereas the interconnection substations are located close to the proposed interconnection to the existing BPA and PSE power lines. The proposed location for the PSE interconnection substation has been revised since the DEIS was issued and would be located just to the east of Stevens Road, north of where PSE's IP Line crosses I-90. Access to the PSE interconnect substation would be via a new access driveway from Stevens Road to the west. The PSE point of interconnection (POI) would also serve as the PSE point of delivery (POD). If interconnection to the BPA transmission system was selected by the Applicant, BPA would construct, own and operate an interconnection station. The BPA interconnection substation would be located at BPA's existing Schultz substation, located approximately 14 miles northwest of the project site. The locations of the on-site step-up substations, the feeder lines and the interconnection substations are indicated in Figures 1-1, 1-2, and 1-4 (revised) of this FEIS. The Applicant would own, operate and maintain both the BPA and PSE feeder lines.

Project Feeder Line to PSE

For interconnection with PSE, the project feeder line would run south from the on-site PSE step-up substation to the PSE interconnect substation and would run over private land for a total of approximately 8 miles. The POI with PSE's IP Line would also be designated as the PSE POD for the project. One road crossing would be required over Vantage Highway as indicated in Figure 1-4 of this FEIS, "Revised Project Site Map."

Meteorological Stations

The project design would include five permanent meteorological (met) towers fitted with multiple sensors to track and monitor wind speed and direction and temperatures. The permanent towers would be free-standing (unguyed), would be as tall as the hub height (HH) of the wind turbine generators (WTGs) which is 46–80 meters (151–262 ft.), and would be connected to the plant's central Supervisory Control and Data Acquisition (SCADA) system (Figure 2-4).

Access Roads and Construction Trails

Access to the project site would be achieved via an existing private graveled access road that branches from Vantage Highway at a location approximately 11 miles east of the City of Kittitas. This road is commonly known as Beacon Ridge Road. This road is a private road and the Applicant, through an adaptive management approach, will allow controlled access to and through the project site. Access at the project site is discussed in greater detail in updated Section 3.5, Wildlife, of this FEIS. Access is also addressed in several responses to comments submitted on the DEIS (see Chapter 4 of this FEIS for comments and responses). The project site is currently crisscrossed with an extensive network of existing roads and, wherever practical, existing roads would be utilized to minimize new ground disturbance. Up to 15 miles of existing roads would need to be improved and up to 17 miles of new roads would be constructed. The access roads and roads between turbine strings would generally consist of 20-foot wide compacted gravel surface and a 2-foot wide shoulder on either side to blend with the surrounding contours and allow for proper drainage. The roads between contiguous turbines in a string would be 34 feet wide to accommodate larger crane equipment to move between the individual turbine sites safely. In areas of steeper grades, a cut and fill design would be implemented to keep grades below 15% to facilitate access and help prevent erosion. Other graveled areas are parking areas near the project operations and maintenance facility and at a visitor's kiosk near the site entrance on Vantage Highway, as well as 3 equipment lay-down areas adjacent to the site roads. Revised Figure 1-4 in this FEIS, "Revised Project Site Layout" illustrates the location of the project facilities.

Project Setbacks

Setbacks associated with wind projects are based on safety and avoidance of nuisance concerns, industry standards, and on the Applicant's experience in operating wind power projects. Currently the nearest residence to the proposed project lies approximately 1 ¾ miles to the south. However, a safety setback distance of 541 feet has been specified in the Development Agreement between the Applicant and Kittitas County (Kittitas County 2005). As noted in Section 5.17, Turbine Setbacks from Residences, a minimum safety zone setback of 541 feet will be maintained between Project wind turbines and residences located outside the Project boundaries. Should the Applicant wish to install wind turbines closer than 541 feet to the Project boundary, the Applicant would need to obtain an easement or covenant that restricts the construction of any new residences within 541 feet of any turbine as measured from the nearest turbine tower center point to any such new residence. The remoteness of the site would avoid potential nuisance impacts such as noise and shadow-flicker.

The specified setback distance of 541 feet exceeds the setback considerations for tip height that relate to the size of the actual turbines to be installed. (Tip height refers to the total distance from the base of the turbine to the tip of the blade at its highest point). Tip height setbacks are primarily safety-related (e.g., if an entire tower and turbine were to collapse from a massive earthquake either combined with or independent from hurricane force wind, they would not fall on a public road or a neighbor's property). All public roads and adjoining properties are located beyond the proposed turbine tip height.

Lighting

The Applicant would also comply with FAA's aircraft safety lighting requirements for structures greater than 200 feet tall, which could include turbines and met towers. Requirements include marking these structures with lights that flash white during the day and red at night. See Figure 3.10-11 in this FEIS for the proposed lighting plan for the Wild Horse Wind Power Project (WHWPP).

2.2.4 Construction Activities

Construction Schedule, Activities, and Milestones

The construction schedules are based on obtaining Governor approval by the summer of 2005.

Project Schedule with Different Turbine Sizes

The construction schedule would not be significantly affected by the selection of different WTG sizes or manufacturers. The installation of larger or smaller numbers of WTGs would impact the construction schedule as shown in Table 2-4 of the DEIS. Construction activities would occur within the work windows defined in the Development Agreement between the Applicant and Kittitas County, as well as those defined in the settlement agreement between WDFW and the Applicant. The actual schedule for construction may be adjusted to allow for plan review and approval activities by EFSEC.

Table 2-3. Proposed Project Construction Schedule Summary

Task/Milestone		Start	Finish	Approx. On-Site Staff/Crew for Task
1	Governor Approval	6/15/05	6/15/05	
2	Engineering/Design/Specifications/Surveys	6/15/05	8/2/05	18
3	Order/Fabricate Wind Turbines	6/15/05	12/13/05	0
4	Order/Fabricate Substation Transformer	6/15/05	12/6/05	0
5	Road Construction	8/3/05	11/8/05	30
6	Foundations Construction	8/24/05	1/10/06	60
7	Electrical Collection System Construction	9/21/05	2/7/06	40
8	Substation Construction	8/3/05	12/20/05	20
9	Wind Turbine Assembly and Erection	12/14/05	5/16/06	40
10	Plant Energization	1/25/06	5/16/06	30
11	WTG Commissioning	1/25/06	5/16/06	15
12	Commercial Online Date	5/16/06	5/16/06	
Total				253

2.2.6 Decommissioning

The design life of major project equipment such as the turbines, transformers, substations, and supporting plant infrastructure would be at least 20 years. The trend in the wind energy industry has been to repower older wind projects by upgrading older equipment with more efficient turbines. It is likely that after mechanical wear takes its toll, the project could be upgraded with more efficient equipment and could have a useful life longer than 20 years. Such upgrades may require additional EFSEC review and approval in advance of the repowering being performed.

Prior to construction of the project the Applicant will provide to the County and to EFSEC, a Project decommissioning and site restoration plan as required by Washington Administrative Code (WAC) 463-42-655. The Plan would be prepared in sufficient detail to identify, evaluate, and resolve all major environmental and public health and safety issues reasonably anticipated by the Applicant. If the project were terminated, the Applicant would request the necessary authorizations from EFSEC and landowners with which leases have been established to decommission the facilities. Decommissioning the project would involve removal of the Turbines; removal of foundations to a depth of 3 feet below grade; re-grading the areas around the Project Facilities; removal of project access roads and overhead cables (except for any roads and/or power cables that the Project Areas landowners wish to retain): and final reseeding of disturbed lands. A detailed engineering estimate of the amount of funds needed for the Decommissioning would also be provided and reevaluated every 15 years.

The Applicant would provide financial security for the performance of its decommissioning obligations through a Performance Bond. The Performance Bond would be in an amount equal to the amount provided in the engineering estimate for Decommissioning. More information associated with the Decommission of the proposed project can be found in the Development Agreement between Kittitas County and the Applicant (Appendix A of this FEIS).

2.4 Mitigation Measures Inherent in Project Design

Facility design would include mitigation measures as well as compliance with applicable codes and standards and implementing best management practices for erosion and sedimentation control. These mitigation measures were presented for each resource topic throughout Chapter 3 of the Draft EIS. These measures were also summarized in Table 1-2 of the DEIS. In addition to those mitigation measures inherent to the project design, additional mitigation measures identified through the impact analysis presented in the DEIS, the Development Agreement with Kittitas County (Appendix A), and the Settlement Agreement with WDFW (Appendix B) have been included in this FEIS in the respective resource sections and summarized in the Summary Table 1-2 of this FEIS,

2.5 Alternatives Considered but Eliminated from Detailed Study

2.5.2 Consideration of Alternative Project Layouts

The proposed layout was defined during the project development phase based on the results of Applicant-commissioned surveys and studies including cultural resource surveys, telecommunications obstruction analysis, plant and wildlife studies, and visual impact assessments, and considerations of terrain, technology and existing infrastructure on site (e.g., roads.).

As a result of this process, the project infrastructure was sited to avoid all documented locations of wetlands, streams, cultural resources and other sensitive areas within the project area. Since the DEIS was issued, the FAA issued Determinations of Non Hazard (DNH) for 127 proposed turbine locations. Nine turbine locations proposed along the ridgelines of Whiskey Dick Mountain exceeded the FAA Average Mean Sea Level (AMSL) zone over the project area (see Figure 3.14-2). As such, proposed turbine locations A1, A2, A3, B1, B2, B3, D1, D2, and D3 have been removed from the proposal. Although turbine *locations* have been removed, the Applicant would attempt to re-allocate the nine turbines along string corridors identified in the application, and therefore the total number of turbines would not change. Mitigation is identified in this EIS to further reduce and avoid potential impacts.

2.6 Off-Site Alternatives

To comply with the requirements of EFSEC Energy Facility Siting Rules Title 463 WAC and Chapter 80.50 Revised Code of Washington (RCW), EFSEC requested an investigation into potential off-site alternatives within Kittitas County (Figure 2-6). As an update to this FEIS, the off-site alternatives analysis has been revised, where applicable, for the Desert Claim project, based on the August 2004 FEIS for that project (Kittitas County 2004).

2.6.2 Alternative Sites Selected for EIS Analysis

Desert Claim

The DCWPP is a proposed wind power project under review by Kittitas County. An application was submitted in January 2003 to Kittitas County Community Development Services by Desert Claim Wind Power LLC for permits to construct and operate the wind facility. An FEIS was issued for the Desert Claim project in August 2004. The FEIS evaluated a modified proposal, reducing the potential for conflict with the visual flight rules (VFR) traffic pattern associated with Bowers Field, along with the potential for phasing construction of the project. The modifications to the project resulted in shifting of

the proposed locations for the wind turbines, access roads, power collection cables and other project facilities. EFSEC is aware that the Kittitas County commissioners acted on April 5, 2005 to deny the DCWPP application submitted to the County.

Location and Site Characteristics

Approximately 53% of the site consists of shrub-steppe and 30% as grasslands. Remnant native shrub-steppe and grassland vegetation remain around the outer edges of the valley. The existing vegetative cover in most of the valley is dominated by agricultural cultivation and landscape plantings. Habitats range from poor to moderate quality for wildlife. Five perennial and 14 intermittent streams occur within the Desert Claim project area (Kittitas County 2003b).

There are no publicly owned lands in the project area. The project area is in a rural, relatively lightly populated section of Kittitas County and is characterized primarily by cultivated feed crop production or pasture. There are extensive areas of rangeland used for grazing. Rural residential development occurs in a number of locations, including dwellings on farm or ranch properties, scattered residences on large lots, and a few small clusters of homes. Thirty-two residences (including 1 abandoned trailer) are located either within the project area or within 1,000 feet of the project boundary. Approximately 8 residences are located within the boundary of the project area. (Kittitas County 2004).

Wind Power Facilities

The proposed DCWPP project would occupy approximately 82 acres of land and support up to 120 turbines (Table 2-8 and Figure 2-9). The specific facilities for the project include:

- A maximum of 120 wind turbines, each with a capacity of 1.5 MW and a total project generation capacity of 180 MW;
- Free-standing tubular-steel towers up to 213 feet high and supporting three-bladed rotors (Total maximum height including blades of 340 feet);
- Approximately 27.5 miles of roads;
- Approximately 31 lineal miles of underground 34.5-kV electrical power lines;
- One substation, (or possibly two) occupying 1 to 2 acres, with step-up transformers;
- Up to several miles of overhead 115- or 230-kV transmission line from the substation to the regional transmission system;
- One 5,000-square-foot operations and maintenance facility with parking, and
- As many as five met towers up to 212 feet in height.

Construction of the project would require 9 months and 120 to 150 workers. DCWPP would operate and maintain the wind facility during an assumed 30 years useful life. Operation and maintenance would include round-the-clock monitoring of output and performance and patrolling the project area to ensure security.

2.9 Benefits or Disadvantages of Reserving Project Approval for Later Date

Several regional utilities have identified a need for renewable wind-generated energy to diversify their resource portfolios. Failure to approve the project at this time potentially could make it more difficult for

these utilities to meet their stated goals of cost effective portfolio diversification at a minimum cost to their customers.

2.10 Applicable Federal, State and Local Requirements

Table 2-10. Pertinent Federal, State, and Local Codes, Ordinances, Statutes, Rules, Regulations, and Permits

Permit or Requirement	Agency/Code, Ordinance, Statute, Rule, Regulation or Permit
Noise Control	Washington Department of Ecology (Ecology)
	Noise Control, Chapter 70.107 RCW; Chapter 173-58 WAC, Sound Level Measurement Procedures; and Chapter 173-60 WAC, Maximum Environmental Noise Levels.
	Kittitas County Code 9.45, Noise

2.11 Coordination and Consultation with Agencies and Indian Tribes

The Applicant has consulted with local, state, and federal agencies and tribal representatives throughout the development of the proposed WHWPP. EFSEC has also conducted public informational meetings, EIS scoping meetings, and a public hearing on the DEIS.

2.11.1 Local Agency Contacts

County Planning Staff

Both the Applicant and EFSEC have coordinated with Kittitas County throughout the Application and EIS development phases of the project. The Applicant submitted land use application materials (the rezone, conditional use permits, and development agreement request) for the proposed project to Kittitas County Community Development Services (CDS) department for administrative review on June 4, 2004. On June 17, 2004, Clay White of CDS sent a letter requesting that the Applicant submit two forms and a map in order for the application to be complete. On June 25, 2004 the Applicant submitted a request for a Comprehensive Plan change (sub-area plan). The County reviewed the submitted materials and requested additional information (complete 300' adjoiners list). The Applicant submitted a complete application and requested copies on July 23, 2004. Kittitas County CDS issued a notice of application on July 28, 2004, with an August 30, 2004 comment deadline. On March 4, 2005, Kittitas County approved the WHWPP designation as subarea for their comprehensive plan, enacted a wind farm resource overlay zone for the project, approved a Development Agreement with the Applicant, and issued a development permit authorizing the project to proceed; all contingent upon the approval of an EFSEC site certification approved by the Governor of the State.

County Public Works Department

Representatives of the Applicant met with County Public Works Director Paul Bennett on October 14, 2003 to discuss the location of the project and any potential concerns in terms of potential impacts on County facilities such as roads. Mr. Bennett requested assurance that the Applicant would agree to mitigate for any impacts that might occur to County roads (primarily Vantage Highway) from construction traffic and requested confirmation that the project would not interfere with any existing or proposed approaches or protected airspace for the Ellensburg Airport (Bowers Field). Mr. Bennett conducted a detailed review of the potential issues associated with the project through the DEIS and the

Land Use Permit Application filed with the County. Concerns of the Department have been addressed in the Development Agreement between the Applicant and Kittitas County (Kittitas County 2005).

Fire District

The project area is not within any existing fire district. Vantage and KFD #2 are the two closest fire districts, but KFD #2 has considerably more equipment and staffing than Vantage. The Applicant executed a fire services contract with Fire District #2 for the Project on September 10, 2004.

2.11.2 State Agency Contacts

WDFW

Jones & Stokes and the Applicant's wildlife and plant consultant contacted WDFW regarding the potential occurrence of state-listed threatened or endangered species within the project area. This consultation is described in Section 3.4, "Vegetation and Wetlands," and Section 3.5, "Wildlife." Representatives of the Applicant and their wildlife and biological consultants have met with staff of the WDFW (Lee Stream and Ed Bracken), and WDFW staff contracting with EFSEC (Ted Clausing and Brent Renfrow) to discuss the proposed project beginning on May 29, 2003. Copies of the study protocols and draft findings were provided to WDFW. The Applicant organized a site tour for a group of WDFW regional staff and managers from the Ellensburg and Yakima offices on September 25, 2003. During this site visit, WDFW representatives had the opportunity to visit any areas of the proposed project and the proposed transmission feeder lines they wished to visit and to discuss the findings of the wildlife and plant studies conducted at the site with the principal researchers. In further consultation with WDFW, additional mitigation measures have been identified. These additional mitigation measures are included in the settlement agreement (February 2005) between the Applicant and WDFW and have been incorporated into this FEIS. In addition, and above and beyond mitigation measures inherent to the project's design or identified by WDFW or any other agency for the proposed WHWPP, the Applicant has voluntarily committed to placing the entire project area into a conservation easement.

OAHP

Representatives of the Applicant and the Applicant's cultural resources consultant, Lithic Analysts, met with Russell Holter and Stephanie Kramer, Washington State Office of Archaeology and Historic Preservation (OAHP), and Irina Makarow, EFSEC, on June 15, 2004 to discuss the cultural resources issues associated with the proposed project. After reviewing the information submitted by the Applicant and the history and status of tribal consultations by the Applicant and EFSEC, OAHP staff requested that the Applicant's cultural resources consultant submit a letter to OAHP addressing whether the proposed WHWPP area constitutes a cultural landscape as defined by the National Register of Historic Places (NRHP). The Applicant conducted a Cultural Landscape Investigation (Trautman 2005), and determined that no historical properties were located within 2/3 mile of the area of visual dominance for the WHWPP, and that the area does not constitute a cultural or historic landscape as defined by the NRHP.

At the June 15, 2004 meeting, the Applicant also informed OAHP of the fact that the Applicant was in the process of entering into a contract with the Confederated Tribes of the Colville Reservation (CCT) to conduct an analysis of potential traditional cultural properties (TCPs) at the project site. Results of the CCT's analysis of the TCPs are related below.

2.11.4 Tribal Contacts

Yakama Nation

Lithic Analysts, the Applicant's cultural resources consultant, sent a letter on March 5, 2003, to Mr. Johnson Meninick, Cultural Resources Director of the Yakama Nation, notifying the Yakama Nation of the location of the proposed project and the planned cultural resource surveys to be conducted at the project site. The Applicant followed up with a subsequent letter on June 30, 2003 to Mr. Meninick initiating formal consultation with the Yakama Nation and inviting the tribe to offer comments on the project's potential effects and to assist in identifying any previously unrecorded cultural resources which that might be located in the project area. On August 19, 2003, the Applicant forwarded Mr. Meninick a copy of the draft Cultural Resources Assessment and Archaeological Survey for the proposed project site, prepared by Lithic Analysts. Copies of this correspondence are included in Appendix A [DEIS]. Lithic Analysts also contacted Mr. David Powell, Yakama Nation ceded lands archaeologist, regarding the cultural resources surveys to be conducted at the project site and offered to allow Mr. Powell and/or other tribal representatives to participate in the field surveys. However, Mr. Powell declined because of scheduling conflicts. No written response was received from the Yakama Nation regarding any of these communications.

Confederated Tribes of the Colville Reservation

Lithic Analysts, the Applicant's cultural resources consultant, sent a letter on March 5, 2003, to Adelin Fredin, Tribal Historic Preservation Officer of the CCT, notifying the CCT of the location of the proposed project and the planned cultural resource surveys to be conducted at the project site. The Applicant followed up with a subsequent letter on June 30, 2003 to Ms. Camille Pleasants, Interim Tribal Historical Cultural Preservation Officer of the CCT, initiating formal consultation with the CCT and inviting the tribe to offer comments on the project's potential effects and to assist in identifying any previously unrecorded cultural resources which might be located in the project area. On August 13, 2003, Lithic Analysts contacted Guy Moura (CCT) by phone to advise that a copy of the draft Cultural Resources Assessment and Archaeological Survey was completed and that a copy was being forward to CCT. Also, on August 13, 2003, the Applicant forwarded Ms. Pleasants a copy of the draft Cultural Resources assessment and Archaeological Survey for the proposed project site, prepared by Lithic Analysts.

On September 19, 2003, Ms. Pleasants sent a comment letter to the Applicant in response to the draft cultural resources assessment and surveys conducted at the Site. On October 17, 2003, the Applicant sent a letter to Ms. Pleasants in response to her comment letter. On December 16, 2003, the Applicant forwarded Ms. Pleasants an updated draft Cultural Resources Assessment and Archaeological Survey. On January 5, 2004, Ms. Pleasants sent a comment letter to the Applicant in response to the December 16 letter and draft Cultural Resources Assessment and Archaeological Survey.

Lithic Analysts contacted Donald Shannon, CCT Traditional Cultural Property Project Supervisor, by phone on January 13, 2004. On January 14, 2004, Ms. Pleasants sent a comment letter to the Applicant in response to the phone call of January 13. On January 19, 2004, the Applicant arranged a meeting to be held on February 19, 2004 with the CCT, the Applicant, Lithic Analysts and EFSEC. Donald Shannon called the Applicant on January 23, 2004, to express concerns that cultural resource site-specific information should be removed from EFSEC web site.

A February 19, 2004 meeting was held and attended by the Applicant, and representatives of EFSEC and CCT. The Applicant responded to CCT's concerns by entering into a contract to conduct a TCP study and to provide to EFSEC upon its completion.

A TCP Study was conducted by CCT. The results are confidential and proprietary to the CCT. In the report, tribal members identified traditional places and resources within the project area. Concerns have been forwarded and are being addressed between Zilkha and the CCT.

The report provides an overview and documentation of TCP, resulting in an inventory for Zilkha Renewable Energy's WHWPP. The CCT History/Archaeology Program was contracted to conduct research to assist Zilkha to be in compliance with Federal and State cultural resource laws, specifically in obtaining its EFSEC permit. To this end, History/Archaeology Program staff conducted overview, including review of contractor reports, site forms and maps from OAHP, ethnographic literature related to the project area, and performed in-field documentation resulting in inventory. Tribal members with personal and family history in the general area were interviewed for input regarding TCPs that may be impacted by the undertaking. Their responses demonstrate archaeological features considered TCPs exist in and adjacent to the proposed WHWPP area. Their input enhances the understanding of the extent of the traditional territories of the Wenatchi people, the significance of traditional resources, and the relevance and importance of current property studies.

Wanapum Tribe

Lithic Analysts, the Applicant's cultural resources consultant, sent a letter on March 5, 2003, to Lenora Seelatsee of the Wanapum Tribe, notifying the tribe of the location of the proposed project and the planned cultural resource surveys to be conducted at the project site. To date, the Wanapum have neither replied to the letter nor expressed any concern with the project. The Applicant indicated that a copy of the cultural resources survey report will be forwarded to them. The August 2004 DEIS was distributed to Lenora Seelatsee. Comment was not received on the DEIS.

Spokane Tribe

On March 30, 2004, EFSEC notified Honorable Warren Syler of the Spokane Tribe regarding submittal of the WHWPP Application for Site Certification. On June 8, 2004, The Spokane tribe notified EFSEC that it would allow earth-disturbing activities on the project site, provided that if any artifacts are found, the Tribe will be contacted immediately and all work cease on the site. The August 2004 DEIS was distributed to Randy Abrahamson, Tribal Historic Preservation Officer, and to the Honorable Warren Seyler, Spokane Tribal Business Council – Chair. Comment was not received on the DEIS.

2.12 Potential for Future Activities

No expansions or additional activities are currently planned for this site. However, expansion of the project would require simply extending roads and collector cable to serve additional turbines. If market, technology or other conditions evolve in a manner that encourages expansion, there is potential for adding additional wind turbines within or adjacent to the existing project boundary in the future, subject to landowner consent and regulatory approval. The environmental impacts of any future expansion of the WHWPP would be evaluated by EFSEC under a separate environmental review process pursuant to the requirements of the State Environmental Policy Act (SEPA).